

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DIANA WILLIAMS,

Plaintiff,

**NOTICE OF MOTION**

-against-

CITY OF NEW YORK,

**12 CV 6805 (VEC)**

Defendant.

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**PLEASE TAKE NOTICE** that that upon the Declaration of Mark D. Zuckerman, dated January 16, 2015 and the exhibits annexed thereto; the defendant's Local Rule 56.1 Statement, dated January 16, 2015; the defendant City of New York's Memorandum of Law, dated January 16, 2015; and upon all prior pleadings and proceedings had herein, defendant City of New York, will move this Court, before the Hon. Valerie E. Caproni, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, at a date and time to be determined, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, for partial summary judgment and the dismissal of plaintiff's entire complaint, with the exception of plaintiff's discrimination claims while plaintiff was held at the NYPD's 122<sup>nd</sup> Precinct and Staten Island Central Booking.

**PLEASE TAKE FURTHER NOTICE**, that, plaintiff is to serve her opposition papers on the undersigned on or before February 16, 2015; and

**PLEASE TAKE FURTHER NOTICE** that the moving defendant is to serve its reply papers on or before March 2, 2015.

Dated: New York, New York  
January 16, 2015

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York  
Attorney for Defendant City of New York  
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By:                     /s/                      
Mark D. Zuckerman  
Senior Counsel